

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION - AKRON**

In re:)	Case No. 15-52335 (AMK)
)	
JEAN B. ADAMS,)	Chapter 7
)	
Debtor.)	Judge: ALAN M. KOSCHIK

**MOTION OF TRUSTEE TO EMPLOY THE LAW FIRM OF DETTELBACH,
SICHERMAN & BAUMGART AS COUNSEL**

Robert S. Thomas, II, respectfully represents to the Court that he is the duly appointed, qualified and acting Trustee in the within case under Title 11 of the U.S. Code, and that there appears to be assets belonging to the within estate which must be administered and disposed of by the Trustee.

The Trustee further represents that it is necessary that he employ counsel to represent him in administering and disposing of such assets. The specific, presently anticipated actions that are to be performed by counsel consist of:

1. The investigation, pursuit and/or recovery of preference claims. Based on information provided to the Trustee as of the present date, the total maximum recovery on the preference claims will be approximately \$30,000.00. Counsel will prepare all demand letters for recovery of the preferential transfers, and commence adversary proceedings to avoid and recover the preferences, if necessary. Counsel will litigate any and all preference claims and file all motions, notices and orders for Rule 9019 compromises. As of the present date, the

estimated cost of the bankruptcy estate for legal services will be between \$3,000.00 (if there are prompt settlements with respect to the claims) and \$15,000.00 (if litigation is necessary).

2. Objecting to the allowance of claims, conducting Rule 2004 examinations to the extent necessary, and investigation and possible pursuit of undisclosed assets, potential preferential transfers, other possible improprieties or claims, with respect to all of which there is either no currently known value or insufficient information to form a belief as to the current potential values thereof and too many unknown factors to presently project the cost to the bankruptcy estate for such services.

The Trustee further represents that the law firm of Dettelbach, Sicherman & Baumgart (the "Firm"), and the members and associates thereof, represent no interest adverse to that of the within estate, that the members and associates thereof are "disinterested persons" as that term is defined in Section 101(14) of the Bankruptcy Code. The members and associates of the Firm are qualified to act as attorneys in this case; and pursuant to Section 327(d) of the Bankruptcy Code, it would be in the best interest of the within estate to authorize the members and associates of the Firm to serve as the attorneys in this case under Title 11 of the U.S. Code.

The law firm of Dettelbach, Sicherman & Baumgart (the AFirm@) shall be compensated by the Trustee at the Firm=s regular and customary hourly rates, and only upon the filing and

approval of a fee application by the Firm. The current hourly rates to be charged by the Firm which are reviewed and adjusted on an annual basis are as follows:

Marvin A. Sicherman:	410.00
Richard A. Baumgart:	410.00
Robert D. Barr:	325.00
Patrick A. Hruby:	260.00

WHEREFORE, the Trustee prays that he be authorized to employ the law firm of Dettelbach, Sicherman & Baumgart as counsel in this case under Title 11 of the U.S. Code.

Respectfully submitted,

/s/ Robert S. Thomas, II
Robert S. Thomas, II, Trustee
1653 Merriman Road, #203
Akron, Ohio 44313
Phone: (330) 253-5738
Fax: (330) 253-5743
Email: rsttrustee@yahoo.com

NOTICE

Pursuant to Local Bankruptcy Rule 9013-1, any objection to this application must be filed by February 17, 2016. If no response or objection is timely filed, the Court is authorized to grant the relief without further notice.

/s/ Robert S. Thomas, II
Robert S. Thomas, II, Trustee

CERTIFICATE OF SERVICE

I certify that on February 3, 2016, a true and correct copy of the foregoing Motion to Employ Counsel was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Pauline Aydin Shuler, Esq., attorney for the Debtor, at paydinlegal@hotmail.com

Robert S. Thomas, Trustee, rstrustee@yahoo.com

United States Trustee at (registered address)@usdoj.gov

And via regular U.S. mail upon the following parties:

Robert D. Barr, Esq.
Dettelbach, Sicherman & Baumgart
1801 East Ninth Street, Suite 1100
Cleveland, Ohio 44114-3169

Jean B. Adams
387 Lynn Drive
Cuyahoga Falls, OH 44221, Debtor

/s/ Robert S. Thomas, II
Robert S. Thomas, II, Trustee

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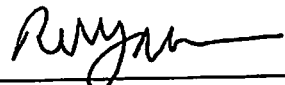
In Re:)	Case No. 15-52335 (AMK)
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JEAN B. ADAMS,)	Chapter 7
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Debtor.)	Judge: ALAN M. KOSCHIK

**AFFIDAVIT AND VERIFIED STATEMENT PURSUANT TO RULES
5002 AND 2014 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Robert D. Barr, being first duly sworn, deposes and states as follows:

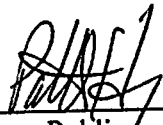
1. He makes this Verified Statement pursuant to the provisions of Sections 327(a) and (c) of the Bankruptcy Code regarding the employment of professional persons by the trustee, and in light of the restrictions and requirements imposed thereon by Rules 2014(a) and 5002 of the Federal Rules of Bankruptcy Procedure.
2. This verified statement supplements the disclosures contained in and accompanying the Motion of Trustee to Employ the Law Firm of Dettelbach, Sicherman & Baumgart as Counsel filed with this Court (the "Law Firm").
3. This Verified Statement is to affirm to this Court that neither Affiant, nor any person with whom he is associated in the practice of law is a relative by blood or marriage of any Bankruptcy Judge of the Northern District of Ohio, and that he is not now nor has he ever been so connected with any such Judge as to render his appointment or the Court's approval of his Law Firm's employment as Counsel in the above-captioned matter improper.
4. This Verified Statement is to further affirm to this Court that neither Affiant, nor any person with whom he is associated in the practice of law, is connected with the debtor, creditors, or any other party in interest or their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee. Affiant further discloses that two of the partners in the Law Firm, Marvin A. Sicherman and Richard Baumgart, serve as chapter 7 panel trustees in the Northern District of Ohio.

5. Further, this Verified Statement is to fully disclose to the Court matters that might be considered by any party to create any issue or claim of conflict or lack of being a disinterested party, as relates to his law firm acting as counsel in this case and to disclose to the Court that the only fees and expenses to be paid to Affiant shall be those allowed pursuant to order of this Court, with none of such fees or expenses to be shared with third parties other than the members and associates of Affiant's law firm.



Robert D. Barr

SWORN TO BEFORE ME, and subscribed in my presence this 27th day of January,
2016.



Notary Public

**Patrick Allen Hruby, Attorney at Law
Resident Summit County
Notary Public, State of Ohio
My Commission Has No Expiration Date
Sec 147.03 RC**

